

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
FLORENCE DIVISION

Jacquelyn Stewart, ) C/A No.  
 ) State Court C/A No. 2022-CP-21-01505  
 Plaintiff, )  
 )  
 Versus )  
 )  
 South Carolina CVS Pharmacy, L.L.C., )  
 )  
 Defendant. )

**NOTICE OF REMOVAL**

PLEASE TAKE NOTICE that the Defendant South Carolina CVS Pharmacy, L.L.C.  
(hereinafter, "the Defendant") has this day filed in the Office of the Clerk of the United States  
District Court for the District of South Carolina, for the Florence Division, a Notice for Removal  
of the above-entitled action from the State Court of South Carolina in the Circuit Court for the  
County of Florence, South Carolina, to the District Court of the United States for the District of  
South Carolina, for the Florence Division.

1. The above-entitled action was instituted by the Plaintiff against the Defendant by the filing of a Summons and Complaint, on or about July 27, 2022, and this action is now pending in the State Court of South Carolina in the Circuit Court for the County of Florence.

2. At the time of the commencement of the action, upon information and belief, the Plaintiff was and still is a citizen of the State of South Carolina.

3. The Defendant, South Carolina CVS Pharmacy, L.L.C., is now and at all times intervening, organized and existing under the laws of the State of Rhode Island and having its principal place of business in Rhode Island.

4. The United States District Court for the District of South Carolina has original jurisdiction over Plaintiff's Amended Complaint pursuant to 28 U.S.C. § 1332. All parties to this action are diverse as citizens of different states as a corporation is considered a citizen of any state in which it has been incorporated or any state where it has its principle place of business. Furthermore, Plaintiff's Amended Complaint demands judgment against the Defendant for actual damages and punitive damages. Although no specific monetary value is included in the Amended Complaint, Plaintiff counsel has confirmed via email that the damages alleged would exceed the sum or value of \$75,000.00, exclusive of interest and costs; therefore, this action is one which may be removed to this Court by the Defendant pursuant 28 U.S.C. § 1441.

5. A copy of this Notice for Removal is being served on all adverse parties and filed with the Clerk of Court, Florence County Courthouse, where this case was originally filed.

6. The Defendant files herewith a copy of all process, pleadings, and orders served upon it in this action as a part of this Notice, being the Summons and Amended Complaint and Affidavit of Service.

WHEREFORE, the Defendant, South Carolina CVS Pharmacy, L.L.C., respectfully requests that this Court will consider this Notice for Removal as provided by law governing the removal of cases to this Court; that this Court will make the proper orders to effect the removal of this cause of action from the Court of Common Pleas, Florence County, to this Court; and that this Court will make such orders as may be appropriate to effect the preparation and filing of a true record of all proceedings that may have been had in the circuit court.

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**October 4, 2022**  
Charleston, South Carolina

**/s/ Molly H. Craig**  
Molly H. Craig (FED #6671)  
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*Attorneys for the Defendant  
South Carolina CVS Pharmacy, L.L.C.*

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
FLORENCE DIVISION

Jacquelyn Stewart, ) C/A No.  
                        )  
Plaintiff, )                      **VERIFICATION**  
                        )  
Versus                 )  
                        )  
South Carolina CVS Pharmacy, L.L.C., )  
                        )  
Defendant. )

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PERSONALLY APPEARED before me, the undersigned, who being duly sworn, deposes and says:

That she is one of the attorneys for the Petitioner herein and is authorized to sign this Notice of Removal for Petitioner. That she has prepared and read the foregoing Notice of Removal and the matters and things therein are true as she verily believes.

**October 4, 2022**  
Charleston, South Carolina

**/s/ Molly H. Craig**  
Molly H. Craig (FED #6671)  
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